

FILED

JUN 9 2010

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)**

Plaintiff,)

v.)

BETTER FAMILY LIFE, INC.,)

Defendant.)

Case No. 4:09-cv-01595-HEA

STIPULATED PROTECTIVE ORDER REGARDING MEDICAL DOCUMENTS

Plaintiff EEOC ("Plaintiff") and Defendant Better Family Life, Inc. ("Defendant") agree to enter into this Protective Order with respect to documents responsive to Defendant's Request for Production of Shante Davis' medical records from January 1, 2008, to the present.

Such documents, which are hereby designated and shall be stamped as "confidential" for the purposes of this litigation, may be used, if permitted by the Court, by the parties in connection with the instant lawsuit only and for no other purpose.


Such documents: (1) may be disseminated by Plaintiff's and Defendant's counsel to their respective staff; (2) may be shown by Plaintiff's and Defendant's counsel, but not disseminated, to witnesses in connection with preparation for their testimony, for use during their depositions and/or for use during their testimony at trial; and (3) may be disseminated by Plaintiff's and Defendant's counsel to Court personnel and court reporters in connection with depositions and trial. All individuals to whom documents are disseminated or shown must be notified in advance about, and are deemed bound by, this Protective Order.

Such documents may be filed with the Court only under seal, as permitted by the Court following good cause shown by a motion to file under seal.

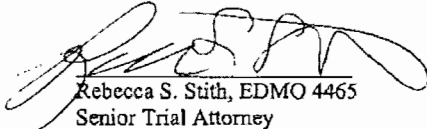
Such documents shall be returned to Plaintiff by Defendant within sixty (60) days of the termination of the instant lawsuit, whether by settlement, judgment or trial, including the termination of any and all appeals, for destruction pursuant to established federal document destruction procedures.

The parties' agreement to this Protective Order does not waive any objections that either party may have to the admissibility of such documents based on relevance or other grounds.

SIGNED this 9th day of June, 2010.


U.S. District Court

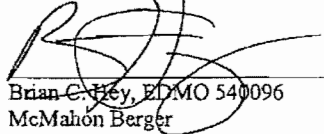
FOR PLAINTIFF:



Rebecca S. Stith, EDMO 4465
Senior Trial Attorney
EEOC-St. Louis District Office
1222 Spruce St., Room 8.100
St. Louis, MO 63103
(314) 539-7917
(314) 539-7895 (Fax)
rebecca.stith@eoc.gov

COUNSEL FOR PLAINTIFF

FOR DEFENDANT:



Brian C. Hey, EDMO 540096
McMahon Berger
2730 North Ballas Road, Suite 200
St. Louis, MO 63131-3039
(314) 567-7350
(314) 567-5968 (fax)
LeMoine@mcmahonberger.com
Bhey@mcmahonberger.com

COUNSEL FOR DEFENDANT